

CYNDY DAY-WILSON (SBN 135045)
cday-wilson@ci.eureka.ca.gov
CITY ATTORNEY, EUREKA
531 K Street
Eureka, CA 95551
Telephone: 707-441-4147
Facsimile: 707-441-4148

MICHAEL A. SWEET (SBN 184345)
msweet@foxrothschild.com
JACK PRAETZELLIS (SBN 267765)
jpraetzellis@foxrothschild.com
FOX ROTHSCHILD LLP
345 California Street, Suite 2200
San Francisco, CA 94104
Telephone: 415-364-5540
Facsimile: 415-391-4436

Attorneys for CITY OF EUREKA
Creditor and Real Party in Interest

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SANTA ROSA DIVISION

In re:

FLOYD E. SQUIRES III AND
BETTY J. SQUIRES,

Debtors.

CASE NO. 17-10828 WJL 11

Chapter 11

**CITY OF EUREKA'S THIRD REQUEST
FOR JUDICIAL NOTICE IN SUPPORT
OF CITY OF EUREKA'S MOTION TO
APPOINT CHAPTER 11 TRUSTEE**

Date: March 26, 2018
Time: 9:00 a.m.
Judge: Hon. William Lafferty
Location: U.S. Courthouse
3140 Boeing Avenue
McKinleyville, CA

The City of Eureka ("City") hereby requests that the Court take judicial notice of the following documents in support of the City's Motion to Appoint a Chapter 11 Trustee:

<u>Date</u>	<u>Item</u>	<u>No.</u>
1/10/2018	Issued Inspection Abatement Warrant [for 833 H Street]	A
1/10/2018	Application for Abatement/Inspection Warrant [for 833 H Street]	B
1/10/2018	Memorandum of Points and Authorities in Support of Inspection/Abatement Warrant Application [for 833 H Street]	C
1/10/2018	Affidavit of Code Enforcement Program Manager Matthew Morgan in Support of Application for Inspection/Abatement Warrant for the Listed Property [833 H Street]	D
1/10/2018	Declaration of Director of Public Works/Chief Building Official Brian J. Gerving in Support of Application for Inspection/Abatement Warrant for the Listed Property [833 H Street]	E
1/10/2018	Declaration of Deputy Public Works Director Brian Issa in Support of Application for Inspection and Abatement Warrant [for 833 H Street]	F
1/10/2018	Appendix of Exhibits [In Support of Application for Inspection Abatement Warrant for 833 H Street]	G

The above documents are subject to judicial notice because they are facts that can be accurately and readily determined from sources whose accuracy cannot be reasonably questioned. Fed. R. Evid. 201(a)(2); *Disabled Rights Action Committee v. Las Vegas Events, Inc.*, 375 F.3d 861, 883 (9th Cir. 2004) ("undisputed matters of public record" are subject to judicial notice).

Dated: February 26, 2018

FOX ROTHSCHILD LLP

By /s/*Michael A. Sweet*

Michael A. Sweet

Michael P. Sweet
Attorneys for Creditor and Real Party in Interest
City of Eureka